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Attorney for Defendants Kim Ki Sung and KSK Corporation

IN THE DISTRICT COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and) CIVIL ACTION NO. 05-0019
XU JING JI)
Plaintiffs)))
V.) PROPOSED CASE MANAGEMENT) SCHEDULE OF KIM KI SUNG ANI
JUNG JIN CORPORATION, ASIA) KSK CORPORATION
ENTERPRISES INC., PARK HWA SUN)
KIN HANG KWON, KIM KI SUNG and)
KSK CORPORATION)
Defendants)
)

Comes now defendants Kim Ki Sung and KSK Corporation which submit the following proposed Case Management Conference Statement:

(a) Service of Process:

Defendants have been properly served.

(b) Jurisdiction and Venue:

Subject Matter Jurisdiction and venue is proper.

(c) Track Assignment:

Standard

(d) Anticipated motions:

The motions defendants anticipate filing include, but are not limited to the following:

- 1. Motion to amend answer;
- 2. Discovery motions;
- 3. Summary judgment motions.

(e) Anticipated Discovery and Limitation on Discovery:

- 1. Interrogatories will be served upon plaintiff by defendant.
- 2. A request for Production of Documents will be served upon plaintiff by defendant.
- 3. A Request for Admissions will be served upon plaintiff by defendant.
- 3. Defendants anticipates taking, at least, the depositions of Li Ying Hua, Li Zheng Zhe and Xu Jing Ji. Additional depositions may be necessary of other persons who are later learned to possess discoverable knowledge.

(f)Further proceedings:

Defendants leave the setting of the proceedings to the court.

(g) Special Procedures:

Not necessary.

((h)	Modification	of the stand	ard pre-trial	procedures:
		Midullication	or the stand	aru pre-triar	procedures.

No modifications necessary.

(i) **Settlement prospects:**

Defendants believe settlement may be possible.

(j) Limitation of issues:

No limitation is necessary, at this time.

(k) **Setting of dates:**

Defendants leave setting of dates to the Court.

Law Office of G. Anthony Long

By:_____/s/____ Kelley M. Butcher